

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

UNITED STATES OF AMERICA	§	
	§	
V.	§	CAUSE NO. A-23-CR-135 (RP)
	§	
SAINT JOVITE YOUNGBLOOD	§	

MOTION FOR DISCLOSURE PURSUANT TO RULE 404 (B)

TO THE HONORABLE ROBERT PITMAN, UNITED STATES DISTRICT JUDGE:

COMES NOW Defendant SAINT JOVITE YOUNGBLOOD, by and through his undersigned counsel, and respectfully requests that this Honorable Court enter an order directing the government to comply fully with its obligations under Rule 404(b) of the Federal Rules of Evidence.

Mr. Youngblood seeks any evidence the Government intends to introduce against him pursuant to Rule 404 (b) of the Federal Rules of Evidence, including but not limited to, any evidence the Government intends to introduce against him regarding prior or subsequent criminal conduct and/or “bad acts” which are not charged in the Indictment.

Defense counsel previously has verbally communicated this request to counsel for the government. Mr. Youngblood requests the Court set a deadline for 404(b) notice so that Mr. Youngblood and his counsel have adequate time to prepare any necessary objections before trial.

Docket call in this case is scheduled for April 5, 2024, and trial is scheduled to begin April 15, 2024.

WHEREFORE, Defendant Saint Jovite Youngblood respectfully requests that the Court order the Government to comply with its obligations under Rule 404(b).

Respectfully submitted,

MAUREEN SCOTT FRANCO
Federal Public Defender

/s/ CHARLOTTE A. HERRING
Assistant Federal Public Defender
Western District of Texas
Lavaca Plaza
504 Lavaca St., Ste. 960
Austin, Texas 78701
(512) 916-5025
(512) 916-5035 (FAX)
Bar Number: TX 24064026

Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of March, 2024, I electronically filed the foregoing Defendant's MOTION FOR DISCLOSURE PURSUANT TO RULE 404 (B) with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Dan Guess
Matt Harding
Assistant U.S. Attorneys
903 San Jacinto, Ste. 334
Austin, TX 78701

/s/ CHARLOTTE A. HERRING

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ORDER

Before the Court is Defendant Youngblood's Motion for Disclosure Pursuant to Rule 404(b). The Court is of the opinion that the Motion should be GRANTED. The Government is hereby ORDERED to inform Mr. Youngblood of any evidence that the Government intends to introduce at trial regarding prior or subsequent criminal conduct and/or "bad acts" which are not charged in the Indictment and not alleged as part of any conspiracy charged in the Indictment.

The Government is FURTHER ORDERED to inform Mr. Youngblood of such evidence on or before the _____ day of _____, 2024.

Signed this _____ day of _____, 2024.

ROBERT PITMAN
United States District Judge